JEAN E. WILLIAMS,
Deputy Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Division

JOHN S. MOST,
Natural Resources Section
P.O. Box 7611
Washington, D.C. 20044
202-616-3353 || 202-305-0506 (fax)
John.Most@usdoj.gov

Counsel for Defendants

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA GREAT FALLS DIVISION

MONTANA WILDLIFE FEDERATION, et al.	) CV 18-69-GF-BMM
Plaintiffs, v.	<ul><li>FEDERAL DEFENDANTS'</li><li>NOTICE OF LODGING THE</li><li>ADMINISTRATIVE RECORDS</li></ul>
RYAN ZINKE, Secretary of the Interior, et al.	) FOR FOUR MONTANA ) LEASING DECISIONS )
Federal Defendants.	) ) )

On February 22, 2019, Federal Defendants gave notice that they had served on the parties the administrative records ("ARs") for the four Montana leasing decisions in this case (specifically, the leasing decision for the Miles City parcels,

as offered at the December 2017 Montana lease sale; and the leasing decisions for the Billings, Butte, and HiLine parcels, as offered at the March 2018 Montana lease sale). Now Federal Defendants give notice that today they are lodging the four ARs with the Court by transmitting two complete copies of the four records, on separate flash drives, to the Clerk. Federal Defendants will file a declaration certifying the records once Plaintiffs have advised whether they dispute the completeness of the ARs. Federal Defendants note in this regard that the four records being lodged today are identical to the four records lodged and certified in civil action number 18-cv-00073-BMM (D. Mont.) (plaintiffs in that case challenge the same four leasing decisions, although on grounds different from those asserted here).

The four ARs have been indexed and the documents (in PDF format), along with relevant indexes (in Excel format), have been recorded on flash drives (each drive contains all four ARs). The flash drives are being transmitted today by FedEx standard overnight service to the Clerk's office. The four ARs encompass the following bates number ranges:

Miles City	BLM-MT-MC-000001 to BLM-MT-MC-009472
Billings	BLM-MT-BI-000001 to BLM-MT-BI-018856
Butte	BLM-MT-BU-000001 to BLM-MT-BU-013795
HiLine	BLM-MT-HI-000001 to BLM-MT-HI-012551

Federal Defendants note some of the PDF files are quite large. To optimize performance, it is recommended that the flash drives' complete contents be copied

to users' network or computer drives, rather than read from the flash drives themselves.

Respectfully submitted this 24th day of April, 2019.

JEAN E. WILLIAMS
Deputy Assistant Attorney General
U.S. Department of Justice
Environment and Natural Resources Division

/s/ John S. Most JOHN S. Most, Trial Attorney Natural Resources Section P.O. Box 7611, Washington, D.C. 20044 202-616-3353 || 202-305-0506 (fax) John.Most@usdoj.gov

Counsel for Federal Defendants

## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing is being filed with the Clerk of the Court using the CM/ECF system, thereby serving it on all parties of record on April 24, 2019.

/s/ John S. Most
JOHN S. Most
Counsel for Defendants